

E-filed: August 3, 2023

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Attorneys for Genesis Global Holdco, LLC

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re

CASH CLOUD, INC., dba COIN CLOUD,

Debtor.

Case No. 23-10423-mkn

Chapter 11

**GENESIS GLOBAL HOLDCO, LLC'S
 NOTICE OF DEPOSITION OF THE 30(b)(6)
 OF PROVINCE LLC**

Date of Deposition: August 22, 2023¹

Time of Deposition: 10:00 a.m.

TO ALL INTERESTED PARTIES AND THEIR RESPECTIVE COUNSEL:

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and Rule 7030 of the Federal Rules of Bankruptcy Procedure, Genesis Global Holdco,

¹ Or another date mutually acceptable to the relevant parties.

1 LLC (“Genesis”) will take the deposition of the Rule 30(b)(6) of Province LLC (“Province”) on
 2 **August 22, 2023 at 10:00 a.m.**, at the law offices of Shea Larsen, located at 1731 Village Center
 3 Circle, Suite 150, Las Vegas, Nevada 89134, upon oral examination, before an officer authorized
 4 to administer oaths.² The deposition will be recorded by stenographic means and oral examination
 5 will continue from day-to-day until completed.

6 In accordance with its obligations under FRCP 30(b)(6), the Debtor shall produce a
 7 representative with knowledge and ability to testify regarding the topics below.

8 TOPICS FOR EXAMINATION

- 9 1. The sales and marketing process for the sale of substantially all of Debtor’s assets.
- 10 2. The preparation of (a) that certain document entitled “7.10.23 Coin Cloud – 506(c)
 11 Surcharge Analysis” sent on behalf of the Debtor to counsel for Genesis via email on July 10, 2023
 12 (“Surcharge Analysis”), (b) the *Declaration of Tanner James in Support of Motion for Entry of an*
 13 *Order Authorizing Debtor to Surcharge the Collateral of Genesis Global Holdco, LLC, Enigma*
 14 *Securities Limited, and AVT Nevada, L.P.* [ECF No. 927] (the “James Declaration”), and (c) that
 15 certain document entitled “7.26.23 Coin Cloud – Preliminary Sale Analysis vSHARE-C” sent on
 16 behalf of the Debtor to counsel for Genesis via email on July 26, 2023 (“Sale Proceeds Analysis”).
- 17 3. Any analysis, evaluation, or assessment of the necessity or reasonableness of the
 18 fees and costs proposed to be surcharged as set forth in the Surcharge Analysis, the Sale Proceeds
 19 Analysis, or the James Declaration.
- 20 4. Any analysis, evaluation, or assessment of the benefit obtained by Genesis as a result
 21 of the fees and costs proposed to be surcharged as set forth in the Surcharge Analysis, the Sale
 22 Proceeds Analysis, or the James Declaration.
- 23 5. The nature and amount of any fees and costs proposed to be surcharged as set forth
 24 in the Surcharge Analysis of the James Declaration.

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27 ² Genesis notices this deposition to take place currently with Enigma Securities Limited’s (“Enigma”) deposition of the Debtor scheduled to take place at the same time and date as indicated herein. See ECF
 28 954.

6. The reasons for a downward adjustment to sale proceeds for adequate protection reservation.

DATED this 3rd day of August 2023.

SNELL & WILMER L.L.P.

/s/ Robert R. Kinas

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